

**REMARKS/ARGUMENTS**

Claims 1-23 stand canceled.

No amendment has been made to claims 24-28, and no new matter is presented.

Reconsideration of claims 24-28 in view of the following remarks is respectfully  
5 requested.

Claims 24-28 have been rejected over Boyd et al. U.S. Patent Application Publication No. US2004/0231975 in combination with Staerzl U.S. Patent 6,547,952 and Sahr et al. U.S. Patent 6,367,406.

Boyd et al. '975 discloses a conductive coating composition, page 2, paragraph 25,  
10 comprising an emulsion polymer binder including an acrylic polymer and containing electrically conductive graphite particles. Sahr et al. '406 discloses a boat hull 22 including a foam insert 90 surrounded by fibrous reinforcing material 91 placed in molding chamber 82, Fig. 5, between male and female molds 52 and 54 during forming. As noted at Col. 6, lines 51+, as cited by the Examiner, the male and female mold pieces 52 and 54 are preferably coated with a layer of gel  
15 coat prior to enclosing the insert 90 and the fibrous reinforcing material 91 within the cell 70. As noted at Col. 7, line 33, the fibrous reinforcing material 91 can include graphite.

Claim 24 requires that the boat hull (10) comprise a fiberglass layer (54), a conductive layer (21), and an intermediate layer (50), and that the conductive layer (21) comprise the defined first coating (21). The noted first coating (21) is defined in claim 24 as comprising an  
20 electrically conductive polymer-based material. In contrast, even if the teachings of Boyd et al. '975 are applied to the boat hull construction of Sahr et al. '406, the result still does not provide the defined combination because the conductive graphite layer in Sahr et al. '406, namely the fibrous reinforcing material 91, is the intermediate layer between the injected resin hull support structure and the outer gel coat layer provided along the male and female mold pieces 52 and 54.  
25 This is opposite to the construction of claim 24 which requires an intermediate layer (50, e.g. gel coat) between the defined first coating layer (electrically conductive polymer-based material) and the fiberglass layer (54). In the combination of Boyd et al. '975 and Sahr et al. '406, the coating layer (conductive graphite layer 91) is the intermediate layer, namely intermediate the molded resin hull support layer and the outer gel coat layer. Consideration and allowance of  
30 claim 24 is respectfully requested.

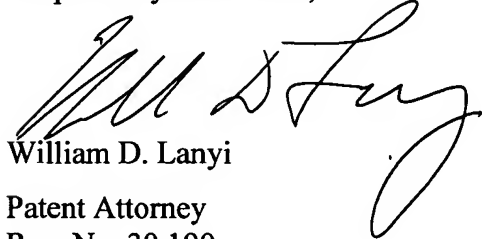
Claim 25 requires that the boat hull (10) has an inner fiberglass layer (54) and an intermediate layer (50), and that the first coating (21) be disposed on the port side (16) of the intermediate layer (50), and that the second coating (22) be disposed on the starboard side (18) of the intermediate layer (50). In contrast, in the combination of Boyd et al. '975 and Sahr et al. '406, the graphite particle conductive coating layer 91 is the intermediate layer, namely being intermediate the molded resin hull support layer and the outer gel coat layer. In the construction defined in claim 25, the intermediate layer (50, e.g. gel coat) is intermediate the conductive coating layer (21) and the fiberglass hull layer (54). Consideration and allowance of claim 25 is respectfully requested.

Claim 26 requires an intermediate layer (50) disposed on the structural support layer (54), and that the first and second conductive layers (21 and 22) be disposed on the intermediate layer (50). Claim 26 is believed allowable for the reasons noted above.

Claims 27 and 28 depend from claim 26 and define subcombinations which are believed allowable. Claim 27 requires that the intermediate layer (50) is a gel coat compound. Claim 28 requires that the first and second coating layers (21 and 22) comprise graphite particles supported in a vinyl ester matrix.

It is believed that this application is in condition for allowance with claims 24-28, and such action is earnestly solicited.

Respectfully Submitted,



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